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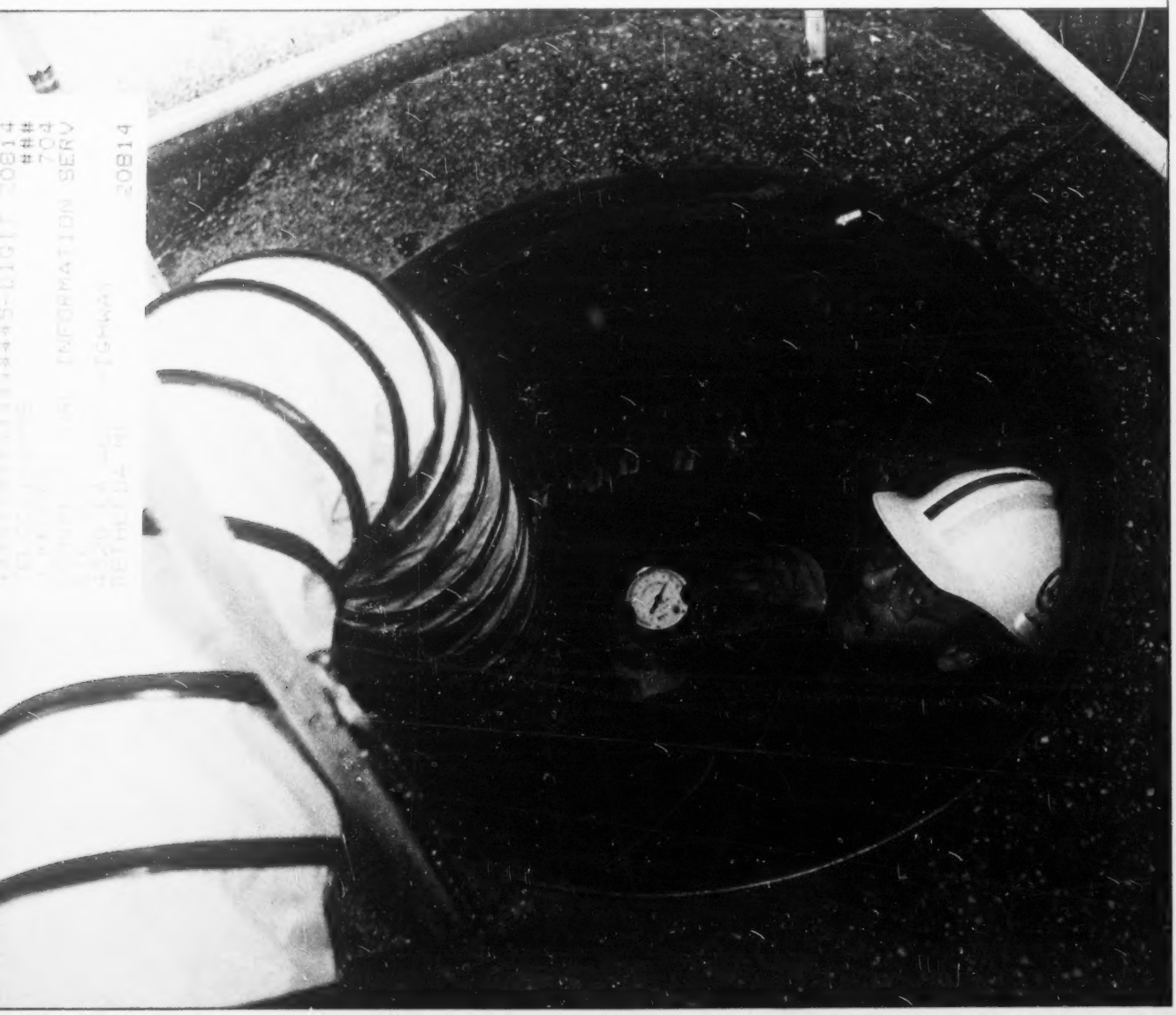

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LETTERS

Not a level playing field

The directory advertising industry has changed radically since the tranquil, pre-divestiture days when it was dominated by AT&T.

Today, at least 12 major companies are competing in this arena. They include the directory publishing affiliates of both the Bell regional holding companies and Independent telephone companies and such independent publishers as R.H. Donnelley.

Currently, however, the affiliates are at a distinct competitive disadvantage vis-a-vis the independent publishers—a fact that state regulatory agencies have so far failed to acknowledge or address. Whereas the affiliates are subject to direct or indirect regulation by state agencies, the independent companies are not, freeing them to concentrate on the most lucrative markets—and to enter and leave those markets at will. The affiliates, moreover, face an additional burden in the form of the hefty publishing rights fees that regulators use to subsidize local phone rates. The independent companies pay no such fees and can price their advertising space as much as 60% below that of the affiliates.

It is time for regulatory commissions to recognize that all markets and all directories are not created equal. Therefore, in considering appropriate licensing methods, regulators should take into account the market value of each directory and the extent of competition that exists in each market. Regulators should also acknowledge the need for flexible and directory-specific valuations of the rights to publish telephone company directories so that the affiliates can maintain competitive price and cost structures.

If regulators fail to recognize the increasingly competitive nature of the directory advertising business, the affiliates' ability to compete with the independent publishers will continue to erode. Over time, that will surely lead to a permanent loss of market share and sales for the affiliates—and, in turn, reduce the publishing rights fees they do pay.

Steven B. Meadows
Senior Consultant
Communications Industry Practice
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Correction

The article, "Carriers plan $24 billion outlay in 1986," which appeared in the Jan. 13 issue (p. 32) contained an error in Table I. The SNET and Contel figures for access lines were reversed. Contel has 2,227,591 access lines and SNET has 1,600,000. TELEPHONY regrets the error.

Wedded bliss

Your editorial, "A solid, contemporary marriage," in the Jan. 20 issue (p. 29), was both complimentary and correct in its observations about USTA's unity and effectiveness 2 years after the Bell companies joined our association. As with any good marriage, the credit must go to the members—in this case the 1100-plus telephone companies which USTA represents. In particular, the officers and directors of this association have done much to make the relatively-young marriage of Bell and Independent companies work so well.

When you consider that the marriage wedded a trade association nearly 90 years of age with seven young Bell regional holding companies and two dozen operating companies, accomplishing the currently healthy relationship is even more remarkable. The credit goes to our members.

John Sodolski
President
U.S. Telephone Assn.
Washington, D.C.

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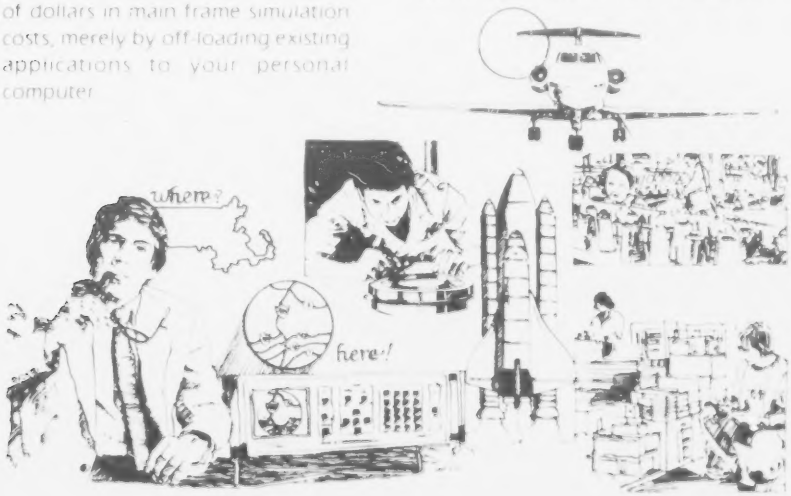

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